

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:13CR174
	§	Judge Crone
MICHAEL RAY a.k.a. Curly (2)	§	

ELEMENTS OF THE OFFENSE

You are charged in Count Two of the First Superseding Indictment with a violation of 18 U.S.C. § 922(j), Possession of a Stolen Firearm. The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

1. The defendant knowingly possessed, received, concealed, stored, bartered, sold, disposed of, or pledged or accepted as security for a loan, stolen firearms;
2. The firearms had been shipped or transported from one state to another; and
3. The defendant knew or had reasonable cause to believe that the firearms had been stolen.

Respectfully submitted,

JOHN M. BALES
United States Attorney

_____/s/_____
TRACEY M. BATSON
Assistant United States Attorney
Texas Bar No. 00784119
101 E. Park Blvd., Suite 500
Plano, Texas 75074
(972) 509-1201
(972) 509-1209 (fax)
Tracey.Batson@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on May 20, 2014.

_____/s/_____
TRACEY M. BATSON